

24 and not having as much paperwork that you can electronically  
25 record documents. They have different settings anywhere

31

1 from just feeding them information to feeding them like a  
2 PDF or TIF version of the document that gets recorded, that  
3 they record in their imaging bank, stamped electronically,  
4 and then send back to us as having been recorded once it's  
5 verified on their side. That document was one of those.

6 Q Yes, ma'am. I understand how it was recorded  
7 electronically. I'm just trying to -- to determine whether  
8 or not Mr. Bly actually signed a physical document or if  
9 a -- his signature was created by Planat Press.

10 A The signature was included by Planat Press  
11 because that document was never printed out.

12 Q So did Mr. Bly review the document before it was  
13 sent for electronic recording?

14 A No.

15 Q So -- and I'm now -- I continue to refer to the  
16 Corey Assignment.

17 Mr. Bly never saw the Corey Assignment prior to  
18 it being recorded; is that correct?

19 A Correct.

20 Q Is there any way he has of checking to see what  
21 documents are being recorded that contained his signature?

22 A Yes.

23 Q And how does he do that?

24 A He can run a report that would tell him which  
25 documents. In this particular case, he could then look up

32

1 and view the documents if he wanted to.

2 Q Is that something he does at the end of every  
3 day?

4 A No.

5 Q Is that something he does at all?

6 A I'm not sure.

7 Q Is a part of his job description to review the  
8 documents that he -- that contain his electronic signature?

9 A No. It's a part of somebody else's  
10 responsibility.

11 Q And so somebody else checks all of the electronic  
12 signatures at the end of the day?

13 A No. They check them before they go out for  
14 recordation to make sure that the form is correct. It's a  
15 document inspector.

16 Q Okay. Do you know who the -- is there anything  
17 on the Corey Assignment that would identify who the document  
18 inspector was?

19 A No.

20 Q About how long -- how long does that process  
21 take? Let's say Nationwide received a request from  
22 CitiMortgage to generate a -- 2,000 Assignments, how long  
23 would it take from the time that request was made until you  
24 had 2,000 Assignments like the Corey Assignment  
25 electronically filed?

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1 A Well, the way you asked that question, it doesn't

2 work that way. Depending on where we can electronically  
3 record and depending on whether or not we have clean files  
4 in which to data enter if we need further information.  
5 Generally, just say hypothetically we have perfect files and  
6 we were recording them all in Duval County, Florida and we  
7 were electronically recording them, maybe ten days at the  
8 most.

9 Q Uh-huh.

10 A That's if everything was, like, perfect  
11 alignment, if that makes sense, not --

12 Q When you say "perfect files," what do you mean by  
13 that?

14 A In order for us to enter the information on this  
15 file, we have to be supplied copies of documentation --

16 Q Uh-huh.

17 A -- such as the mortgage and any Assignment of  
18 record, depending on if that's required, which I do not  
19 believe it is in Florida, but I'm not a hundred percent sure  
20 of that.

21 So we would have to be supplied the -- they give  
22 us an electronic download of the Assignments they want. We  
23 verify the images usually that they give us versus the  
24 download and enter in the appropriate information off of  
25 those documents to create the Assignment of Mortgage.

34

1 Q Do you mean like if they give you an image of a  
2 mortgage, you'd check the public records to make that --  
3 sure that image is correct? Is that what you mean?

4 A No, no. If it's a recorded mortgage, it usually

5 has a recording stamp, so we don't verify that that's  
6 correct. We verify that, okay, if they said Bob Smith, the  
7 loan was \$100,000 on this date, we make sure -- and for this  
8 property address, that that mortgage is the mortgage that  
9 we're looking at.

10 Q So do you also prepare Affidavits as well or just  
11 Assignments of Mortgage?

12 A No. We can also prepare a Lost Assignment  
13 Affidavit.

14 Q Uh-huh. Under what circumstances do you do that?

15 A Normally they're only prepared when say, for  
16 instance, we're doing a Lien Release and then -- or an  
17 Assignment and the company that the Assignment -- like  
18 there's a break in what's called the "chain of title" and  
19 the Assignment cannot be gotten because a company's out of  
20 business.

21 Like more so in the last couple of years due to  
22 our industry, there are a lot more companies where you can't  
23 go get the Assignment signed.

24 Q Uh-huh.

25 A We have a service that does that, where we go

35

1 find old companies to sign Assignments, to get them back.  
2 But if they cannot be found or the lenders out of business,  
3 you'd want to do a Loss of Assignment Affidavit indicating  
4 that it was not included in the collateral file and that the  
5 lender is out of business.

6 Q Do you prepare those Affidavits for filing in  
7 Florida?

8 A I don't know if Florida is an L.A. state. I know  
9 Florida has gotten more strict recently regarding that in  
10 regards to foreclosure and stuff like that.

11 Q Okay. Just to go back to make sure that I  
12 understand, I thought that previously you mentioned that  
13 Mr. Bly signs a couple of thousands of Assignments and  
14 releases a day?

15 A Yes.

16 Q So is there another group of documents where he  
17 is actually physically signing?

18 A Yes.

19 Q Okay. So we have two groups: One group that he  
20 physically signs and then some that -- where his signature  
21 is just electronically generated?

22 A Correct.

23 Q But with the Corey Assignment, you're saying this  
24 one was electronically generated?

25 A Correct.

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1 Q And how can you tell that this -- that the Corey  
2 Assignment was electronically generated?

3 A Because I looked it up before I came in here to  
4 see how it was recorded, and it's in what we refer to as an  
5 E-record, which is an electronically recorded document.

6 Q So you -- if it's E-recorded, it means it was  
7 that it was generated by computer?

8 A Uh-huh.

9 Q And it was not actually signed?

10 A It was not actually physically signed, yes.



11 Q Okay.

12 A Those signatures are counted as signatures for  
13 electronic recording.

14 Q I'm showing you a copy of another Assignment of  
15 Mortgage.

16 Do you recognize that document?

17 MS. PARSONS: I'm going to object to this as it's  
18 irrelevant to this case. It has to do with a  
19 completely different mortgage.

20 THE WITNESS: And a completely different client.

21 Q (By Ms. Drysdale) Do you recognize the document?

22 A Yes.

23 Q I -- I just noticed that the signature was very  
24 different on this Assignment of Mortgage.

25 A Yes.

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1 Q And I'm going to call this the M-E-S-S-I-C-A  
2 Assignment.

3 Do you know why the signature was so different?

4 A Yes. Our signers have the ability -- one of  
5 things we track is they two different site signatures. They  
6 can have the long form signature, which is what you see on  
7 the electronically recorded document, and they can also have  
8 shorthand signatures.

9 Q Can you describe the difference between the two  
10 for me?

11 A Generally, depending on the volume of loans that  
12 we are executing documents for, the shortened signature  
13 works to push the documents, to get more of them executed.

14 But we keep on record the file -- the names that they -- the  
15 signatures that they sign under, like they have in their  
16 employee file a record of their longhand and shorthand  
17 signature.

18 Q So would Exhibit 4, he actually -- Mr. Bly  
19 actually did sign this one?

20 A He signed this one.

21 MS. DRYSDALE: Okay. That's 4.

22 (Defendant's Exhibit Number 4 was marked for  
23 identification.)

24 MS. PARSONS: I'm going to object that being  
25 entered into evidence for the record.

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1 Q (By Ms. Drysdale) And how long has Mr. Bly been  
2 working at Nationwide?

3 A He's been employed for over seven years.

4 Q Has -- has he been a signer that whole time?

5 A Yes.

6 Q What about Crystal Moore? She -- is she also a  
7 signer?

8 A She is also a signer and a notary.

9 Q And a notary.

10 And her practices are the same as you've  
11 described with Mr. Bly as far as how she -- what her daily  
12 duties are in executing documents?

13 A Yes.

14 Can I ask why you're asking about Crystal Moore  
15 because her name's not on any of the documentation regarding  
16 this.

17 Q I just saw her name on the Consent of the  
18 Executive Committee we marked as 3.  
19 A Uh-huh.  
20 Q So are all of the names on Exhibit 3, the Joint  
21 Consent, are they all signers?  
22 A You mean is their job duty?  
23 Q Yes, ma'am.  
24 A No. See, I'm even listed on there.  
25 Q So you are listed on here as a -- an assistant

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1 secretary and vice president. Do you have other duties?  
2 A For Citi?  
3 MS. PARSONS: Objection.  
4 Q (By Ms. Drysdale) That's the way I understand it.  
5 Maybe I misunderstand Exhibit 3.  
6 A I think you do.  
7 Q Okay. Can you --  
8 A Yeah.  
9 Q Can you describe the list of names for me?  
10 A The list of names are employees of Nationwide  
11 Title Clearing that we give to them to -- to have them  
12 authorize them to be signers as vice presidents or assistant  
13 secretaries. The list is generated to insure that depending  
14 on the volume of loans that have to be executed we have  
15 enough employees in Nationwide to execute all of those  
16 documents. Included in there, are people who have other  
17 capacities at NTC, but in the time of overload, could go  
18 assist in that particular area.  
19 Q So the people who are listed on Exhibit 3 are



20 people who could act as vice presidents or assistant  
21 secretaries, but each of these persons are full-time  
22 employees of Nationwide; is that correct?

23 A Correct.

24 Q Okay. In that -- the Assignment of Mortgage,  
25 particularly the Corey Assignment of Mortgage, lists the

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1 note. Does Nationwide ever have possession of the original  
2 notes?

3 A For Assignments of Mortgage?

4 Q Yes.

5 A No.

6 Q What other types of responsibilities does Mr. Bly  
7 have as a vice president?

8 A That is it. It's solely for the execution of  
9 documents as listed in Defense Exhibit 3.

10 Q And is he accountable for the accuracy of the  
11 documents that he signs?

12 A To whom?

13 Q To either Nationwide or to the -- to the company  
14 for which he is a vice president at CitiMortgage.

15 A No. Nationwide's responsible for the accuracy of  
16 the documents.

17 Q So in his position as vice president, he doesn't  
18 have any responsibility under the Joint Consent of the  
19 Executive Committee for the accuracy of the documents he  
20 executes?

21 A No. All he's responsible for is signing them.

22 Q Is there any sort of -- did Assignments Mr. Bly

23 have to undergo any sort of screening process or training to  
24 become a vice president or assistant secretary of  
25 CitiMortgage?

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1 A No.

2 Q Does he have any special qualifications to be a  
3 vice president or assistant secretary?

4 A In the capacity of signing the documents?

5 Q Yes, ma'am.

6 A No.

7 Q And does he have any -- does he communicate with  
8 anyone at CitiMortgage relating to his responsibilities as  
9 vice president or assistant secretary?

10 A No.

11 Q So does he have any guidelines provided to him by  
12 CitiMortgage, Inc., relating to his executed -- execution of  
13 his duties as vice president or assistant secretary?

14 A The guidelines that are provided are provided via  
15 Nationwide Title Clearing since his only capacity is as --  
16 as a signer for them. He has no other capacity.

17 Q So he doesn't have any other duties as -- with  
18 Citi?

19 A None.

20 Q Doesn't receive any compensation?

21 A None.

22 Q He doesn't have to attend board meetings or any  
23 other types of meetings with Citi?

24 A No. It actually says that literally the only  
25 capacity he works on -- and that's under the second "Further

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1       Resolve," the only capacity he does is as a signer of the  
2       documents.

3               Q     Okay. And I believe that it says that he  
4       executed any and all --

5                     (Brief interruption in proceedings.)

6               A     I'm sorry. What was the question?

7               Q     And he is authorized to execute documents  
8       required in connection with processing releases and  
9       Assignments; is that correct?

10              A     Yeah.

11              Q     Does he have to complete any sort of reports to  
12       Citi?

13              A     No.

14              Q     Do you in your capacity as vice president or  
15       secretary?

16              A     Do I have to give any reports to Citi?

17              Q     Correct.

18              A     Not personally, no.

19              Q     Okay. But I guess somebody at Nationwide needs  
20       to?

21              A     We send them reports on the progress of the  
22       completion of the projects they give us.

23              Q     I noticed in -- in this particular situation the  
24       note was transferred after the loan was in default.

25                     Do you know if that's the -- the normal course of

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1       business for these -- these mortgages to be transferred

2 after they're in default?

3 A I have no idea.

4 Q Is that not the type of information that you'll  
5 have to review prior to -- to preparing the documents?

6 A No, we don't.

7 Q And you -- I think you mentioned that you have  
8 a -- a title company at Nationwide; is that correct?

9 A No.

10 Q There is no title company?

11 A There is no title company at Nationwide.

12 Q Okay. And who does the -- is there any title  
13 work done prior to the -- the preparation of the Assignments  
14 of Mortgage?

15 A Not by Nationwide Title Clearing.

16 Q Who -- do you know if anybody else does any title  
17 work?

18 A No, I don't know.

19 Q What is Release Link?

20 A Release Link is our website that our release  
21 clients use.

22 Q Can you describe that for me?

23 A It allows them to enter and process their Lien  
24 Releases, and also resolve their -- any exceptions that they  
25 have, problem files they have.

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1 Q So the -- the Release Link is the program through  
2 which you prepare the releases?

3 A No. It's a program that our clients are able to  
4 enter information to prepare releases.

5 Q Is that a secure database?

6 A Yes.

7 Q And who has access to enter information?

8 A Only our clients. They actually control their  
9 own users.

10 Q Is -- does the -- so that -- that's sort of a  
11 counterpart to the Planat Press; is that correct?

12 A No. Planat Press is a document generation  
13 platform.

14 Q Okay.

15 A That's used behind the scenes. Release Link is a  
16 website.

17 Q Is there a similar website for the preparation of  
18 the Assignments of Mortgage?

19 A Not at this time.

20 Q Is that something that you're working on?

21 A Yes.

22 Q Also there's a -- is there a department,  
23 foreclosure collateral management?

24 A There is a -- yes.

25 Q Is that a service that -- that Nationwide

45

1 provides?

2 A To one client, yes, which is not Citi.

3 Q Not Citi.

4 About how many people working at Nationwide have  
5 the same position as Mr. Bly as a signer?

6 A Full-time?

7 Q Yes.



8 A Three.

9 Q And then you -- when you say "full-time," you  
10 mean some of these other folks that are on Exhibit 3 fill in  
11 when there's a lot of work to do?

12 A Yeah, when there's higher volume.

13 Q Do you-all -- are you-all also corporate  
14 representatives for Bayview?

15 A Corporate representative. Do we have a corporate  
16 resolution for Bayview?

17 Q Yes.

18 A I would have to verify. We have, at one time,  
19 had a corporate resolution for Bayview.

20 Q Do you ever transfer mortgages into trusts?

21 A No.

22 Q And could you describe the mortgage foreclosure  
23 technology platform?

24 A We don't have a mortgage foreclosure technology  
25 platform.

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1 Q And going back to the Corey Assignment, showing  
2 you again -- this is Exhibit 2, the Corey Assignment, shows  
3 Mr. Jones notarizing the document.

4 AS I understand, Mr. Bly's signature was created  
5 by Planat Press; is that correct?

6 A Uh-huh.

7 Q So was Mr. Jones' signature also created by  
8 Planat Press as the notary?

9 A Yes.

10 Q Okay. And had Mr. Bly actually manually signed

11 the Assignment of Mortgage? How -- what's the process by  
12 which that would be notarized?

13 A What do you mean? He would sign the document,  
14 and then it would get notarized after he signed it.

15 Q How does that process work? Does he sign, you  
16 said like 1,000 documents, and then they get sent to --

17 A It depends on how many are in a -- each batch.  
18 But he would sign a batch of documents, and then he would  
19 take them over to whoever the notary is that's signing for  
20 him.

21 Q So they're located in -- in -- physically in  
22 different parts of the facility?

23 A No. They're in very close proximity to each  
24 other. They're in the same cubicle area.

25 Q Okay.

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1 A Yeah.

2 Q And -- but they're taken over from Mr. Bly to  
3 Mr. Jones in batch?

4 A In that -- if that hypothetically was signed that  
5 way, yes, that's how that would have occurred.

6 Q Did you bring any other documents today pursuant  
7 to the notice?

8 A I brought you what I refer to as a flow chart on  
9 how we process Assignments so you could understand how that  
10 occurs.

11 Q Thank you.

12 A Yeah.

13 THE WITNESS: Those are colored copies, so one of

14 those will have to go that way if it's entered in  
15 because that's all I have.

16 MS. DRYSDALE: And we'll mark this as 5.

17 (Defendant's Exhibit Number 5 was marked for  
18 identification.)

19 Q (By Ms. Drysdale) Okay. I'm looking at your  
20 flow chart that you've put together, and starting at the  
21 upper left hand corner we have "Client." And then it looks  
22 like we have heading right a couple of -- it looks like  
23 pictures of CPU's --

24 A Uh-huh.

25 Q -- is that correct?

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1 Can you describe what these are?

2 A That's -- I think graphically this was from my  
3 marketing person. This is what we would send to a client to  
4 see how our flow chart goes. It's just indicating there's  
5 an electronic. It you look at the bubbles that are listed  
6 on it, it indicates that electronic loan information to  
7 NTC's IT department and how it can be sent.

8 Q Uh-huh.

9 A The other alternate route that doesn't have the  
10 CPU says the client can ship loan files to NTC, or we can go  
11 on-site and capture them.

12 Q What is -- what system is this with the CPU's  
13 where information is obtained -- is sent by the client to --

14 A FTP, CDs, or hard drives or e-mails, secure  
15 e-mail.

16 Q Okay.

17 A It says right there in the box.

18 Q I see. So if you could just briefly describe the  
19 chart. I think that would probably make it --

20 A Okay. This is just indicating -- the first part  
21 indicates that we can receive electronic or physical files  
22 from the client. They go into our data entry area.

23 Depending on if there's an exception or a problem with the  
24 file, it shows how it resolves it, but just data entry.

25 Then it goes to our quality control department.

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1 As you can see, if you look all the way on the left, it  
2 indicates the electronic recording line that I was telling  
3 you about, but then skips the print -- printing and  
4 processing departments.

5 So it would go electronic recording. It goes to  
6 scanning, and then we scan the documents. And they can  
7 either get electronically sent, or sometimes the clients  
8 require them to be physically sent to themselves or their  
9 assignee.

10 But if it goes the physical route, it ends up  
11 being printed out, goes into processing, and then it goes to  
12 our signing department. Our document inspector quality  
13 control checks them. It goes to our checks area, to our  
14 mailroom, out to recording, and then when it comes back, it  
15 gets logged in and scanned.

16 Q Okay. In two different sections, whether the  
17 documents are provided to you -- or the requests are sent to  
18 you electronically or by physical document, you've got a  
19 quality control.

20                   What -- what is -- specifically what is the  
21                   quality control looking for?

22                   A     The quality control is after our data entry  
23                   stuff, not whether or when we receive the files. Is that  
24                   what you're talking about?

25                   Q     Yes.

50

1                   A     It just looks to make sure that the information  
2                   that was being entered is actually correct and that we're  
3                   assigning the correct loan and that the correct information  
4                   is on the Assignment to assign the loan, like the recording  
5                   information, the borrower's name, the address if that's  
6                   needed, any Assignment chains if needed, legal descriptions.

7                   Q     Now, is that something that is done based on  
8                   internal research or based upon the documents provided to  
9                   you by the client?

10                  A     It can be either or. If the -- if a client does  
11                  not give us enough documentation, then they have the option  
12                  of either providing or -- or we can go research it at the  
13                  county level.

14                  Q     And you said sometimes you find missing  
15                  Assignments in that process?

16                  A     It's possible to find a broken Assignment chain.

17                  Q     And what happens at that point?

18                  A     We ask the client how they want to resolve it,  
19                  and they can either resolve it by -- if sometimes they say,  
20                  oh, we can get that Assignment or they ask us to go get the  
21                  Assignment that's missing.

22                  Q     And how -- can you describe the process by which



23 you would go and obtain the Assignment?

24 A Well, we find out who it was -- went to, where  
25 the break is, who needs to sign it, and we contact that

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1 lender if it's possible. They usually research on their  
2 side to verify that that was -- that Assignment is correct,  
3 and then we either generate an Assignment for them or they  
4 will generate an Assignment to us.

5 Q But you said sometimes the companies are no  
6 longer available?

7 A Yeah. It's -- if a company's out of business and  
8 you can't -- sometimes even if they're out of business, you  
9 can contact an officer of that company and have them sign  
10 the document anyway.

11 But hypothetically, if they're totally gone, you  
12 can't find them anywhere, then we report that back to the  
13 client, and they can make the determination at that time if  
14 they want to do a Loss Assignment Affidavit. And that is  
15 also depending on whether the county will take a Loss  
16 Assignment Affidavit. Some counties won't.

17 Q What happens if the county won't take the Loss  
18 Assignment Affidavit?

19 A They have to do what is called a "Quiet Title,"  
20 and I -- that's all I know about that.

21 Q Okay.

22 A It's just a procedure called Quiet Title.

23 Q Did you have any other documents with you today?

24 A No, I don't.

25 Q I thought there was one other document that you

1 copied earlier.

2 A No.

3 Q Okay.

4 MS. DRYSDALE: Did you have any questions that  
5 you wanted to ask?

6 MS. PARSONS: Just a couple.

7 MS. DRYSDALE: Yeah. Because I was thinking if I  
8 could take a break that I might be able to just look  
9 while you're asking the questions and --

10 MS. PARSONS: Okay. I'll just take a couple  
11 questions. I'll give this back to you.

12 THE WITNESS: Okay. Do you want a -- I don't  
13 think that actually got entered into evidence, did it?

14 MS. DRYSDALE: I think we marked it as 5, it just  
15 hasn't been --

16 MS. PARSONS: Doesn't have a sticker on it.

17 THE COURT REPORTER: I didn't -- can we go off  
18 the record for a minute?

19 MS. DRYSDALE: Sure.

20 (A brief off-the-record discussion was held.)

21 CROSS-EXAMINATION

22 BY MS. PARSONS:

23 Q Back to the Assignments of Mortgages  
24 specifically, you stated the color chart -- and previously I  
25 believe that there is a quality control department, correct?

1 A Yes. There's a quality control division.

2 Q A whole division?

3 A Yes.

4 Q Okay. So every Assignment that gets prepared in  
5 this company goes through the quality control division?

6 A Yes.

7 Q How many individuals do you have working in that  
8 division?

9 A There are, I believe, nine.

10 Q Nine. So someone specifically goes through and  
11 looks at the Assignment of Mortgage that was prepared by  
12 you, looks at the mortgage, whether it's in hand or on the  
13 internet as far as obtaining it from the client's website,  
14 to double check that all of the information is correct?

15 A Yeah. They actually -- what they do is there's  
16 two different steps. There's one where they review the  
17 actual entry, and they do that based off of a review sheet  
18 that indicates what are the required fields for that state  
19 and county. And then they look at the images that were  
20 provided to us or if it's a physical file, but I can say in  
21 the last couple of years we do not really have physical  
22 files in the buildings anymore.

23 And then the next step is after they've approved  
24 the actual what was entered, it goes through the processing,  
25 and then it goes through a second quality control check for

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1 the document inspector. Then that's the person that  
2 physically looks at the document to make sure it's got all  
3 the stamps and signers and if like a legal needed to be

4 attached to it or a cover sheet or something like that.

5 Q Okay. So they're reviewing for two things: One,  
6 that it come complies with the county requirements --

7 A Uh-huh.

8 Q -- and two, that it contains all of the proper  
9 information as far as borrower's name, legal description,  
10 that kind of thing?

11 A Uh-huh.

12 MS. PARSONS: Okay. I think that's all I have.

13 MS. DRYSDALE: I have one more question.

14 REDIRECT EXAMINATION

15 BY MS. DRYSDALE:

16 Q Is Mr. Bly, is he also a notary?

17 A Yes. You asked me that previously.

18 MS. DRYSDALE: I don't have anything further.

19 MS. PARSONS: I don't think I do either. Okay.

20 We're done.

21 THE COURT REPORTER: Reading and signing?

22 MS. PARSONS: This is where you get a chance  
23 because of the fact that this is now testimony, this  
24 could be potentially brought into court. You have the  
25 opportunity to get a copy of it and read it physically

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1 to make sure you answered everything in proper -- the  
2 way you wanted to and what you meant to say came out  
3 properly.

4 THE WITNESS: Okay.

5 MS. PARSONS: Or you can just sign and let it go.

6 You don't have to read it.

7 THE WITNESS: No. I'd rather get a copy.

8 (The deposition was concluded at 12:28 p.m.)

9 \* \* \*

10 I hereby certify that I have read and examined the  
11 foregoing transcript, and the same is a true record of the  
12 testimony given by me unless otherwise noted.

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ERIKA LANCE

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1 SIGNATURE PAGE/ERRATA SHEET

2 WITNESS: ERIKA LANCE

3 CASE REFERENCE: BAYVIEW LOAN SERVICES, LLC vs. CYNTHIA LEE  
4 COREY a/k/a CYNTHIA L. COREY, et al

5 CASE NUMBER: 16-2009-CA-016234-MA

6 DATE: June 2, 2010

7 After you have read your transcript, please note  
8 any errors in transcription on this page. Do not mark on  
9 the transcript itself. Please sign and date this sheet as  
indicated below. If additional lines are required for  
corrections, attach additional sheets. If no corrections,  
please indicate "None."



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PAGE	LINE	ERROR OR AMENDMENT	REASON

Under penalties of perjury, I declare that I have read the foregoing transcript, and I subscribe to its accuracy, to include the corrections or amendments noted above or hereto attached.

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ERIKA LANCE DATE

\*Original to: LYNN DRYSDALE, Esquire  
126 West Adams Street, Jacksonville, Florida 32202  
\*Copy to: DANIELLE PARSONS, Esquire  
900 Pine Island Rd., Suite 400, Plantation, Florida 33324

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CERTIFICATE OF REPORTER

STATE OF FLORIDA )  
COUNTY OF PINELLAS )

I, BROOKE WHARTON, Court Reporter, certify that I was authorized to and did stenographically report the deposition of ERIKA LANCE; that a review of the transcript was requested; and that the transcript, pages 1 through 58, inclusive, is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

BROOKE WHARTON  
Court Reporter

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CERTIFICATE OF OATH

STATE OF FLORIDA                    )  
COUNTY OF PINELLAS                )

I, the undersigned authority, certify that  
ERIKA LANCE personally appeared before me and was duly  
sworn.

WITNESS my hand and official seal this 14th day  
of June, 2010.

---

BROOKE WHARTON  
Notary Public  
State of Florida  
My Commission No.: DD846093  
Expires: December 16, 2012

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